

DOCKETED

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Comment Received From: Lennox International Inc.
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**On Promotion on Regulatory Compliance in Installation of Central Air
Conditioners and Heat Pump Systems**

Additional submitted attachment is included below.



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July 31, 2018

California Energy Commission
1516 Ninth Street
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Submitted via: efiling.energy.ca.gov

Re: California Energy Commission Staff Workshop; Promotion of Regulatory Compliance in Installation of Central Air Conditioners and Heat Pump Systems. [Docket 2017-EBP-01]

Lennox International Inc. (Lennox) hereby submits comments on the California Energy Commission (CEC) Staff Workshop; Promotion of Regulatory Compliance in Installation of Central Air Conditioners and Heat Pump Systems rescheduled on July 20, 2018. Lennox is a leading provider of climate control solutions for heating, air conditioning, and refrigeration markets. Lennox is a publicly-traded company that has thousands of employees, and it manufactures equipment subject to the workshop content and potential regulatory action. Lennox has worked extensively through many regulatory venues to develop reasonable and practical regulations.

Lennox welcomes the opportunity to comment on this Workshop and ongoing CEC activity toward improved compliance to California's Title 24 Part 6 Building Energy Efficiency Standards. Lennox supports California's efforts to insure quality of HVAC installations which are aligned with State of California, consumer and manufacturer interest.

Lennox further recognizes the requirements of CA SB 1414, Wolk. The bill requires the Energy Commission, by January 1, 2019, to approve a plan that will promote compliance with specified regulations in the installation of central air conditioning and heat pumps. The bill would authorize the Energy Commission to adopt regulations to increase compliance with permitting and inspection requirements for central air conditioning and heat pumps, and associated sales and installations, consistent with that plan.

Lennox participated in the July 20, 2018 California Energy Commission (CEC) staff workshop where the agency engaged stakeholder discussion regarding the SB1414 and the rationale for striving to improve Title 24 compliance for HVAC installations. While CEC identified current barriers to compliance and offered potential solutions the ongoing discussion lacked in clarity how the potential solutions clearly solve the compliance issues at this time.

In review of the barriers identified, many of which are not new and well know, Lennox finds that they fall into two key categories that are core to the issue.

1. Cost of compliance is significantly higher without providing a sufficient benefit value to the consumer to incent a compliant purchase.
2. The compliance process is complex, expensive and administration is inconsistent.

At this juncture, Lennox strongly advised the CEC to focus efforts to streamline the process and improve the value proposition to consumers by reducing compliance cost and demonstrating consumer benefit as the core of the plan. If the cost – benefit relationship is not addressed further actions will likely result in failure. Lennox urges the CEC to focus its limited resources and time on reforming the existing compliance system to simplify the process and make compliance more affordable, effective and attainable without adding burdensome requirements that may add to the existing compliance problem.

Lennox plans to attend the upcoming Lead Commissioner Workshop on August 3, 2018 and is engaged toward assisting CEC find solutions that have clear linkage to help resolve the compliance issues while minimizing the impacts from manufacturers to end consumers.

Lennox appreciates the opportunity to comment on this issue and looks forward to further engagement and dialogue with CEC on methods to improve compliance.

Sincerely,

A handwritten signature in cursive script that reads "David Winningham". The signature is written in black ink and is positioned above a horizontal line.

David Winningham
Sr. Engineering Manager, Regulatory Affairs